

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

CELSIUS NETWORK LIMITED,

Plaintiff,

v.

STAKEHOUND SA,

Defendant.

Chapter 11

Case No. 22-10964 (MG)

Jointly Administered

Adversary Proceeding

No. 23-01138 (MG)

**JOINT SCHEDULING STIPULATION BETWEEN PLAINTIFF CELSIUS NETWORK
LIMITED AND DEFENDANT STAKEHOUND SA**

This stipulation and scheduling order (“Stipulation”) is entered into by and among Plaintiff Celsius Network Limited (“Celsius”) and Defendant StakeHound S.A. (“StakeHound”) in the above-captioned adversary proceeding in connection with the evidentiary hearing scheduled for September 27, 2023 (the “Hearing”). The parties agree and stipulate as follows:

1. The Hearing originally scheduled for September 27, 2023, is rescheduled to **October 25, 2023 at 9:00 a.m.**
2. StakeHound shall make its production of responsive, non-privileged documents on a rolling basis to be substantially completed **on or before September 30, 2023.**

¹ The Debtors in these chapter 11 cases (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The Debtors’ service address in these Chapter 11 Cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

3. Celsius shall make its production of responsive, non-privileged documents on a rolling basis to be substantially completed **on or before October 7, 2023**.

4. With respect to any additional requests for documents that are sent prior to the Hearing, **responses and objections shall be due by the receiving party on or before the date that is 7 calendar days following service** thereof (which shall be sufficient if sent by email to counsel of record) and, with respect to any requested production of documents, the parties shall meet and confer in good faith in an effort to agree on an appropriate response and production schedule, if any.

5. Privilege and redaction logs with respect to any document production shall be produced within two calendar days of the date for completion of that production.

6. The parties agree to participate in non-binding mediation before the Hon. Michael Wiles, including an in-person mediation session with counsel, the mediator, and principals on **October 13, 2023**.

7. **On or before October 13, 2023 at 12:00 noon EDT**, the parties shall exchange with one another a list of witnesses that each intends to call, or may call, at the Hearing.

8. Depositions noticed by either party may be conducted by Zoom or in-person at the election of the party which seeks to offer the witness (if both parties seek to offer the witness, the election shall be made by the party with whom the witness is or was affiliated).

9. If the Parties cannot reach agreement following reasonable meet and confer efforts concerning any discovery or scheduling issue, either party may send a non-substantive email to the Court requesting a telephonic conference. If the Court does not resolve the dispute during the telephonic conference and if the Court desires briefing such briefing shall comprise a simultaneous

exchange of letters not to exceed three pages, within 24 hours of the conference (or such other period of time as the Court may direct).

10. **On Saturday, October 21, 2023 by 3:00 p.m. EDT** the parties shall exchange with one another a list of exhibits and the deposition designations that it intends to offer at the hearing. The parties shall provide each other with a copy of designations and exhibits.

11. **On Monday, October 23, 2023 by 3:00 p.m. EDT** each party shall identify for the other any objections they intend to assert concerning the other party's exhibits and deposition designations ("Objections").

12. **On Tuesday, October 24, 2023 at 3:00 p.m.,** the parties shall meet and confer in an effort to resolve any objections identified in the pre-trial order in advance of the hearing.

13. The parties agree that witnesses may appear at the Hearing either in-person, or remotely via Zoom, at the election of the party which seeks to offer the witness (if both parties seek to offer the witness, the election shall be made by the party with whom the witness is or was affiliated).

14. Nothing contained herein shall be deemed a waiver or relinquishment by any party of any objection, any right to object to any discovery request, or to seek relief from the Court from any provision of this Stipulation on any grounds.

15. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation.

[Signature page follows.]

SO STIPULATED:

Date: October 3, 2023
New York, New York

/s/ Mitchell P. Hurley

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*Special Litigation Counsel for Debtors and
Plaintiff Celsius Network Limited*

IT IS SO ORDERED.

Dated: October 3, 2023
New York, New York

/s/ Stephanie Wickowski

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/s/ Martin Glenn

MARTIN GLENN

Chief United States Bankruptcy Judge